

### REMARKS

Claims 1, 3, 5, 7, 9-10, 12-13, and 15-33 are pending.

Claims 2, 4, 6, 8, 11, and 14 have been cancelled, without prejudice.

In the Office Action dated February 26, 2010, claims 1-7, 9-10, 12-13, and 15-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Dusevic (U.S. Patent Publication No. 2002/0055868) in view of Roggero (U.S. Patent Publication No. 2003/0028325).

Independent claim 1 has been amended to incorporate subject matter of former dependent claim 2, and to further refer to first, second, third, and fourth paths defining respective orders of execution of software modules. Support for the amendments of claim 1 can be found at least in ¶ [0038], and Fig. 10 of the present application, where Fig. 10 shows a path 56 and a path 58 through software modules of respective tools.

Similar amendments have been made to the other independent claims which are supported by at least the foregoing passages of the present application.

It is respectfully submitted that claim 1 is clearly non-obvious over Dusevic and Roggero.

To make a determination under 35 U.S.C. § 103, several basic factual inquiries must be performed, including determining the scope and content of the prior art, and ascertaining the differences between the prior art and the claims at issue. *Graham v. John Deere Co.*, 383 U.S. 1, 17, 148 U.S.P.Q. 459 (1965). Moreover, as held by the U.S. Supreme Court, it is important to identify a reason that would have prompted a person of ordinary skill in the art to combine reference teachings in the manner that the claimed invention does. *KSR International Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 1741, 82 U.S.P.Q.2d 1385 (2007).

The Office Action conceded that Dusevic fails to disclose the following elements of claim 1: automatically selecting a first subset of software modules of a first tool and a second subset of software modules of a second tool; executing software modules of the first subset in response to first input data and executing software modules of the second subset in response to output from the software modules of the first subset; and determining a first desired product in response to at least executing the software modules of the first and second subsets, where the first desired product includes a model of a reservoir to be produced by a well. 02/26/2010 Office Action at 3-4. However, the Office Action cited Roggero as purportedly disclosing the foregoing subject matter of claim 1. *Id.* at 4. Specifically, the Office Action pointed to the “static module”

in § 1.3.1 of Roggero as being the first subset of software modules, and the dynamic module in § 1.3.2 of Roggero as being the second subset of software modules.

However, there is no hint given in Roggero of selecting first, second, third, and fourth subsets of software modules in the manner recited in claim 1, where the first subset corresponds to a first path in the first tool that defines a first order of execution of the software modules in the first subset, the second subset corresponds to a second path in the second tool that defines a second order of execution of the software modules in the second subset, the third subset corresponds to a third path in the first tool that defines an order of execution of the software modules in the third subset, and the fourth subset corresponds to a fourth path in the second tool that defines an order of execution of the software modules in the fourth subset, where the third path is different from the first path, and the fourth path is different from the third path.

Therefore, even if Dusevic and Roggero could be hypothetically combined, the hypothetical combination of references would not have led to the claimed subject matter. Moreover, in view of the significant differences between the claimed subject matter and the teachings of Dusevic and Roggero, a person of ordinary skill in the art would not have been prompted to combine the teachings of the references to achieve the subject matter of claim 1.

Claim 1 is therefore non-obvious over Dusevic and Roggero.

Independent claims 3, 5, 7, 10, and 13 are similarly allowable over Dusevic and Roggero.

Dependent claims are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested.

The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (SHF.0002US).

Respectfully submitted,

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